

Postal Regulatory Commission Submitted 1/31/2020 12:00:00 PM Filing ID: 112083 Accepted 1/31/2020

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January 31, 2020

Chairman Robert Taub, Vice Chairman Michael M. Kubayanda Commissioner Mark Acton Commissioner Ann C. Fisher Commissioner Ashley E. Poling Postal Regulatory Commission 901 New York Avenue, NW, Suite 200 Washington, DC 20268

RE: Docket No. RM2017-3 Submitted electronically

Dear Commissioners:

Golden State Power Cooperative submits these comments in response to the request by the Postal Regulatory Commission for public input on Docket No. RM2017-3.

Golden State Power Cooperative (GSPC) is the state trade association representing California's rural electric cooperatives and other rural electric utilities. California's electric cooperatives are owned by the people that they serve and comprise a unique sector of the electric industry. GSPC members maintain over 5,000 miles of power line and serve an average of less than 5 customers per mile of powerline; compared to 34 customers per mile of powerline for investor-owned utilities. Less density means less revenue per mile of infrastructure to maintain.

Since cooperatives sell power "at cost," all costs are borne by the consumer. GSPC and our national association, the National Rural Electric Cooperative Association join the Alliance of Nonprofit Mailers in urging you to reconsider your proposal to increase postage rates by a total of up to 40 percent or more over the next five years. The proposal to increase postage costs will not reform the United States Postal Service and will have a severe impact on GSPC's members.

As not-for-profit, consumer-owned and consumer-governed organizations, electric cooperatives utilize mail for many reasons, including distributing cooperative magazines to member-consumers and sending bills to members using First-Class Mail. Cooperative mailings, including the magazines and bill inserts, provide members with critical information about their cooperatives, including their cooperatives' financial condition, how they can participate in electing cooperative directors to represent them on the cooperatives' boards of directors, and how they can participate in cooperative meetings. Those mailings also include information that

can help consumers use energy more wisely, participate in cooperative energy management programs, and otherwise save money on their electric service. And, because cooperatives are not-for-profit and consumer-owned, cooperatives will be forced to pass on to those member-consumers the full cost of any postage rate increases. A 40% or greater increase would have a drastic impact on their mission and their members.

We respectfully request that you reconsider these cost increases. Thank you for your consideration.

Sincerely,

Jessica Nelson General Manager

Golden State Power Cooperative

goldenstatepowercooperative@gmail.com